

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROOTS ROCK RAGE, LLC d/b/a SLOTH
STEADY, a Michigan limited liability
company, and NATHAN RUSSELL,

Plaintiffs,

v.

ELECTRIC FOREST, LLC, a Delaware
limited liability company, MADISON
HOUSE PRESENTS, LLC, a Delaware
limited liability company, and
INSOMNIAC HOLDINGS, LLC, a
Delaware limited liability company,

Defendants.

Case No. _____

DECLARATION OF SHAWN A. TRELL

I, Shawn A. Trell, hereby declare as follows:

1. I am the Executive Vice-President, Chief Operating Officer and General Counsel at AEG Presents LLC. I submit this declaration in support of Defendants' Notice of Removal filed in the above-captioned action. I am familiar with the facts set forth below.

2. Defendant Electric Forest, LLC is a Delaware limited liability company, and its principal place of business is located in Colorado. Its two members are Defendant Madison House Presents, LLC and Defendant Insomniac Holdings, LLC.

3. Defendant Madison House Presents, LLC is a Delaware limited liability company, and its principal place of business is located in Colorado.

4. Madison House Presents, LLC's sole member is AEG Presents LLC, a Delaware limited liability company with its principal place of business is located in California.

5. AEG Presents LLC's sole member is Anschutz Entertainment Group, Inc., which is incorporated under the laws of Colorado, and its principal place of business is located in Colorado.

I declare under penalty of perjury that the statements in this Declaration are based on my personal knowledge, and that, to the best of my knowledge, the statements contained in this Declaration are true and correct.

Executed this 5th day of November, in Los Angeles, California.

A handwritten signature in black ink, appearing to read "Shawn A. Trell", written over a horizontal line.

Shawn A. Trell